



8 Colliers Rise, Radstock BA3 3AU

The Rt Hon Eric Pickles MP  
Secretary of State for Communities and Local Government  
House of Commons  
London SW1A 0AA

24 September 2013

Dear Eric Pickles

We read with interest your decision on Application 12/P/0712/CA/13c, Tropicana, Marine Parade, Weston super Mare. Your decision and the reasons cited in your letter to Richard Kent and dated 5 September 2013, are particularly relevant to the current situation in Radstock, which falls into the unitary authority of Bath & North East Somerset (B&NES). We wish to ask you to intervene on behalf of Radstock by applying the same criteria in the case we will outline in this letter. We will be pleased to elaborate on the situation further, but regard it as essential to begin with an outline of the problems.

Radstock was the centre of the North Somerset Coalfield and boasts a conservation area which includes the town centre, described by English Heritage as 'the best preserved mining town centre' in the country. Such elevated status has not deterred B&NES from continued attempts, over a prolonged period, to damage the town irrevocably by entertaining unacceptable proposals which will lead to the history and heritage assets being totally lost. This reflects a general unwillingness to listen to local people and to press ahead with unsustainable development lacking suitable infrastructure and threatening the much valued town centre.

Unfortunately, this extraordinary town centre is now the object of a number of applications for Conservation Area Consent and Planning which will seriously damage the character and attractiveness of the town, whether to businesses, tourists or local residents and hence impact on the local economy and regeneration prospects.

The three applications are as follows:

1. *The buildings of the former Victorian Infants School*  
13/03682/CA and 13/03668/OUT: Erection of 6 no 2 bedroom dwellings with associated parking, cycle store, refuse store and children's play space following demolition of previous school premises
2. *The remains of the railway works and associated buildings at the centre of the rail network*  
13/02534/CA: Demolition of bridges/underpass, former forge/wagon works, railway platforms and wall in connection with the development of the former Gwr railway land.
3. *The Old Bakery*  
The Forthcoming proposal to demolish the Old Bakery and replace with new-build housing, comprising <13 dwellings.

We would like to draw your attention to the following:

#### **Demolition and the Local Plan**

1. As you state in your letter, the NPPF Paragraph 126 states that, 'Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or

other threats.' B&NES acknowledges this in its own Local Plan<sup>1</sup> (2007:Chapter C3: The Built and Historic Environment). For example, the Plan states in C3.3 PPG15 'Planning and the Historic Environment' emphasises the need for 'Environmental Stewardship' which involves the protection of all aspects of the historic environment. It describes how our historic buildings, landscapes and sites are an irreplaceable record of our past. They are a central part of our cultural heritage, sense of identity and contribute significantly to our quality of life'.

2. Similarly, in C3.30 the Plan states, 'There are other buildings and structures in the District that have not been listed nationally but are of particular local importance either for their architectural interest, their contribution to the local environment, or for their historical associations. For these reasons they are worthy of conservation and enhancement. Examples include non-listed farm buildings, mining structures, nonconformist chapels and former schools.'

These are just two examples of statements in the Local Plan which would lead the reader to believe that it would protect important settlements like Radstock. However, all three of the above planning proposals, which have the apparent support of B&NES, are at odds with the express aims of the above quoted paragraph. The demolition of the above structures, both buildings and railway structures certainly do not accord with the Local Plan.

### **Deliberate Neglect or Damage**

According to the English Heritage *Conservation Areas at Risk Register*<sup>2</sup> The Conservation Area is in 'Very bad' condition, its vulnerability is 'Medium', the Trend is 'Deteriorating'. It is not a new entry and B&NES has been reminded already of the issues surrounding the At Risk Register and has chosen to do nothing to improve the situation.

### **Harm of Demolition**

In C3.31, the B&NES Local Plan sets out the criteria to be used when selecting for their list of locally important buildings. The current applications would certainly challenge these criteria and their use in Policy BH.5: Development which affects a building or structure on the list of Locally Important Buildings will only be permitted where: i) the architectural interest and integrity of the building is conserved or enhanced; ii) the contribution to its context, local interest or historical associations is not adversely affected.

### **Sustaining and Enhancing the significance of Heritage Assets**

You argue that in accordance with Paragraph 131 of Section 12 of the NPPF, local planning authorities, in determining planning applications should 'take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities, including their economic vitality; and the desirability of new development making a contribution to local character and distinctiveness', noting that this includes CAC applications.

We consider that in all three cases under discussion in this letter, there are sufficient grounds to argue against their demolition on the grounds already cited by you:

1. The reinstatement of the rail link to Frome, incorporating much of the old trackway in the conservation area, would yield great economic benefits to residents, businesses and the economy in general. Radstock's development as a tourist destination would be greatly enhanced by better transport infrastructure and as is clear nationally, increased use of and redevelopment of rail is very much at the forefront of transport strategic objectives and meets with very considerable public support.

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<sup>1</sup> [http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Local-Plan/local\\_plan\\_141108\\_web\\_version.pdf](http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Local-Plan/local_plan_141108_web_version.pdf)

<sup>2</sup> <http://risk.english-heritage.org.uk/register.aspx?id=5020&rt=0&pn=1&st=a&ctype=all&crit=radstock>

2. The old Infant School building is currently in poor condition but merits redevelopment, perhaps as residential with some educational/youth facilities included.
3. The Old Bakery is a substantial building which could be redeveloped with housing and a range of community services which would enable viable use as per the NPPF.

Your letter states that you do not 'consider that the public benefits of demolition and reinstatement of beach and seawall outweighs the harm that would be caused to the Beach Lawns Conservation Area by the building's removal at this stage given the current potential for redevelopment. The Secretary of State also considers that the refurbishment of the Tropicana would preserve and enhance the character and appearance of the Conservation Area'.

We argue that if the same approach is applied to Radstock, the harm that would be caused to the Radstock Conservation Area by the above structures' removal would outweigh the benefits suggested by would-be developers. We also argue that the refurbishment of all the assets proposed for demolition would preserve and enhance the character and appearance of the Conservation Area.

It has not been our intention in this letter to elaborate a complete set of arguments in relation to the urgent need to address the current threats to Radstock's Conservation Area and to its regeneration, whilst preserving and enhancing its character.

We would like to ask you to consider the contents of this letter and to support our request for help in improving the wonderful assets and potential of the town, as we continue to oppose totally unacceptable proposals which are at odds with the NPPF and the Local Plan. We will certainly be able to furnish you with detailed evidence in support of our case.

Yours sincerely

Amanda Leon, Secretary, Radstock Action Group

Cc: Jacob Rees-Mogg MP  
Paul Crossley, Leader B&NES  
Members of B&NES Development Control Committee: Gerry Curran, Liz Hardman, Eleanor Jackson, Les Kew, Malcolm Lees, Douglas Nicol, Bryan Organ, Martin Veal, David Veale, Brian Webber, Ian Gilchrist, Manda Rigby plus reserves: Rob Appleyard, John Bull, Sarah Bevan, Sally Davis, Jeremy Sparks, Vic Pritchard, Nigel Roberts  
Simon Allen, B&NES Councillor  
Members of Radstock Town Council  
Ian Lund, B&NES Team Leader Historic Environment  
Sarah James, B&NES Senior Planning Officer  
Rebecca Roberts, B&NES Planning Officer